



DEPARTMENT OF THE NAVY  
NAVAL EDUCATION AND TRAINING CENTER  
NEWPORT, RHODE ISLAND 02841-5000

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NAVSTA NEWPORT RI  
5090 3a

IN REPLY REFER TO:

5090  
Ser 121 / 424E  
21 May 90

3460

Mr. Roy Anderson  
City of Newport  
Director of Utilities  
Halsey Street  
Newport, RI 02840

Dear Mr. Anderson:

As discussed with Rachel Marino on 18 May 1990, concerning the proposed discharge of water from Tanks 53 and 56 in Tank Farm 5 to the sanitary sewer system (NETC letter 30 April 1990), the following sampling and monitoring plan for the treated water effluent is proposed. The treatment system shall consist of an oil-water separator; a counter-current air stripper followed by two carbon absorption units, in series. The sampling and monitoring plan for the treated water from the tanks and dewatering operations is the following:

1. Monitoring will commence at the beginning of the treatment and discharge using a portable gas chromatograph until all water is removed from the tanks and water from dewatering operations is completed. The portable gas chromatograph (GC) will be capable of detecting priority volatile organic compound (VOCs) pollutants identified in the untreated water to levels less than 5 ug/l (micrograms per liter). The flow rate will be monitored daily every eight hours and readjusted, if necessary.
2. Treated effluent will be sampled daily every 8 hours after carbon absorption for 2 cycles of carbon (assume that 1 cycle of carbon equals 14 days based on bench scale testing results). Sampling will occur from the effluent of the second carbon absorption unit.
3. Discharge will cease whenever any of the following concentrations are reached (breakthrough point) in the effluent as detected by the screening or confirmational GC tests:

1,1-Dichloroethane	14 ug/l
Chloroethane	14 ug/l
Vinyl chloride	8 ug/l
Any other priority VOC	10 ug/l
Any priority Acid-Base/ Neutrals	10 ug/l

The discharge will recommence after the carbon absorbers have been replaced.

4. Carbon effluent samples will be analyzed by a certified laboratory for volatile priority pollutants using EPA Method 624 on days 7, 10, 12, and 14 for the first 2 cycles of carbon to verify portable GC results.

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5. A sample of the carbon effluent will be analyzed by a certified laboratory for semi-volatile organic analysis (EPA Method 625) every 7 days for the duration of treatment.
6. Based on experience gained during the first 2 carbon exhaustion cycles, VOC testing for the remainder of the project will be reduced as follows:


On-site GC screening tests: once per day

Confirmation tests by certified laboratory: daily beginning two days prior to the previously observed breakthrough point.

7. Monitoring results will be forwarded to the City of Newport monthly for the duration of the treatment process.

Your timely review of our plan is appreciated, in order that we maintain our schedule. If you have any questions, our point of contact is Rachel Marino at 841-3735.

Sincerely,



HAROLD B. BELSON  
Director of Engineering  
By direction of the Commander

Copy to:

Ms. Cynthia Gianfrancesco, RIDEM

Division of Air and Hazardous Materials

→ Mr. Brian Helland, NORTHNAVFACENGCOM (Code 1411)